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*ADMITTED TO THE NEW YORK BAR CERTIFIED AS ARBITRATOR AND MEDIATOR, R.1:40

> **ADMITTED TO THE PENNSYLVANIA BAR QUALIFIED FAMILY LAW MEDIATOR REGISTERED GUARDIAN

> > **♦** LL.M. IN TAXATION

October 8, 2024

Honorable Cathy L. Waldor, U.S.M.J. Martin Luther King Building & U.S. Courthouse 50 Walnut Street Newark, New Jersey 07102

Vision Industries Group, Inc. v. ACU Plasmold, Inc. Re:

Case No. 2:18-cv-06296 JKS-CLW

Dear Judge Waldor:

This firm is local-counsel for Defendant ACU Plasmold Inc. ("ACU").

Defendant has received two certifications of counsel, each with attached attorney billing information relating to the amount of the underlying sanctions award. But, there has been no motion filed to address the issue as of yet. Consequently, we request the Court's guidance with respect to time frames for a response to Defendant's submissions, and any reply thereto.

It should be noted that one of the questions in the present appeal is whether or not Plaintiff should be compensated for letters. As we would have to assume that Plaintiffs will be compensated for letters until the Judge rules on the appeal, there is a chance that there would be unnecessary work done. That is to say, perhaps the issue of fees should not be briefed until after the Judge's ruling.

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Also, during the month of October there are six weekdays that are Jewish holidays when Edward Miller cannot work.

We thank the Court for its consideration of this request.

Respectfully submitted,

<u>/s/ Edward W. Miller</u> 821 Franklin Ave. Suite 209 Garden City, New York 11530 (917) 770-9016 Attorneys for Defendant ACU

/s/ Michael T Warshaw Michael T. Warshaw, Esq. For the firm Local Counsel for defendant, ACU

Michael Cukor, Esq. (via email and ECF) CC: Evelyn A. Donegan, Esq. (via email and ECF) Edward Miller, Esq. (via email)